



State of New Hampshire  
**DEPARTMENT OF ENVIRONMENTAL SERVICES**  
6 Hazen Drive, P.O. Box 95, Concord, NH 03302-0095  
(603) 271-1370 FAX (603) 271-1381



February 10, 2003

Barrett Ripley  
President & CEO  
Troy Mills, Inc.  
30 Monadnock Street  
Troy, New Hampshire 03465-1000

**CERTIFIED MAIL (7099 3400 0003 0687 2561)**  
**RETURN RECEIPT REQUESTED**

**LETTER OF DEFICIENCY**  
**ARD No. 2003-002**

**RE: Title V Reporting Requirements**

**ADMINISTRATIVELY CLOSED**

Dear Mr. Ripley:

In late October, 2002, representatives of the New Hampshire Department of Environmental Services, Air Resources Division ("DES"), Troy Mills, Inc. ("Troy Mills") and Knowlton Nonwovens, Inc. ("Knowlton") held a meeting at the offices of the Department of Resources and Economic Development in Concord to discuss the operating status of Troy Mills. During the meeting, representatives of Troy Mills and Knowlton informed DES that Knowlton is the owner of the permitted devices and that Troy Mills is the operator. Further, Knowlton representatives stated that while the company previously intended to move the permitted devices to New York, that it was re-evaluating its plan to move and would have a decision from its Board of Directors on December 15, 2002. DES understands that to date, Troy Mills is continuing to operate the permitted devices at the Troy facility.

DES is sending this Letter of Deficiency ("LOD") to Troy Mills as the operator of the permitted devices to inform it of deficiencies noted during the review of the annual compliance certification received for calendar year 2001 and the semi-annual permit deviation and monitoring ("PD/M") reports for calendar years 2001 and 2002. In February 2002, DES sent a guidance package to Troy Mills offering information and assistance on the submittal of reports required by Title V Permit TV-OP-034 ("the Permit"). In the cover letter sent with the guidance package, DES stated that any Title V source submitting reports for calendar year 2001 that did not meet the requirements of the Permit would be contacted and required to resubmit the reports.

DES understands that some Title V sources had already submitted the annual compliance certification for calendar year 2001 and/or the semi-annual PD/M report for the period of July through December of 2001 prior to receiving the guidance package. However, Troy Mills did not submit its annual compliance certification for calendar 2001 until August 2002. The report was due by April 15, 2002. Troy Mills has not submitted a semi-annual PD/M report to DES since July 13, 2001. DES expects that all future reports will fully comply with the requirements of the Permit. DES is providing those Title V sources that submitted incomplete or inaccurate semi-annual PD/M reports for calendar years 2001 or 2002, or annual compliance certifications for calendar year 2001, an opportunity to correct those deficiencies. The specific deficiencies found during the review of Troy Mills' Title V reports for calendar year 2001 are identified below. Note that all references to permit conditions and requirements contained in this LOD refer to the version of the Permit that was in effect during calendar year 2001. All deficiencies specified in this LOD refer to the annual compliance certification for calendar year 2001. The Permit was amended on July 16, 2002. In the amended Permit, some condition numbers have been modified and some permit requirements have been deleted.

1. Troy Mills must certify its compliance status with each and every condition and requirement of the Permit as "Continuous", "Intermittent", or "Not in Compliance", as applicable. If compliance with a condition or item is "N/A", then it must be stated. Troy Mills did not certify its compliance status with Conditions I, II, IV, V, VI, VII, VIII, C or the General Title V Operating Permit Conditions X through XXVIII. Any permit condition that references the equipment, devices, or stacks, (Conditions I through VII of the Permit) can be certified as "Continuous" if no changes have been made to these items since the Permit was issued. Any permit condition that is simply a statement of fact, and cannot be modified through any operational or physical modification, can be certified as "N/A" for its compliance status. There is, however, one exception to having to certify each and every condition and requirement. When there are no deviations from any of the General Title V Permit Operating Conditions X through XXVIII, the compliance status of all of the General Conditions can be certified collectively as "N/A" or with the statement that the requirements of the General Conditions are addressed by other requirements contained within the Permit;

2. For most of the requirements of the Permit, Troy Mills certified that the frequency of the method used for determining compliance was "Continuous", when in fact, the Permit requires an intermittent method. Monitoring or recordkeeping that is performed on a daily, weekly or infrequent basis cannot be accurately certified as "Continuous". Only devices that continually monitor a process or a parameter, such as a continuous emissions monitoring or opacity monitoring system, or a device or system that continually monitors a process parameter (e.g. temperature, pressure, level, or fuel usage rate) and sends that output to a stripchart or computer to be recorded, or sounds an alarm if the limits of the parameter are exceeded, can be claimed as "Continuous" monitoring. Monitoring or recordkeeping that uses manufacturer's data, equipment design, laboratory analysis, or production records is "Intermittent" monitoring. Any monitoring that requires periodic observation and recording, any periodic inspections, all maintenance, and all reporting can only be accurately identified as an "Intermittent" monitoring method;

3. Troy Mills certified that it was in "Continuous" compliance with item #1 of Table 3, Condition VIII.A of the Permit during calendar year 2001. Item #1 states that: "[n]ew or modified devices, new or modified area sources, and existing devices or area sources for which new applications for permits are filed that have the potential to emit, in any amount, substances that meet the criteria of Env-A 1301 shall be subject to Env-A 1300, until such time as the Env-A 1400 requirements supersede the Env-A 1300". Troy Mills was subject to the requirements of Env-A 1300 during calendar year 2001 until Env-A 1400 was superseded by Env-A 1400 on May 8, 2001. DES has information that indicates that Troy Mills was not in compliance with the ambient air limits of Env-A 1300 (or Env-A 1400) during calendar year 2001. Therefore, Troy Mills must certify "Not in Compliance" with item #1;

4. Troy Mills certified that it was in "Continuous" compliance with item #3 of Table 3, Condition VIII.A of the Permit during calendar year 2001. Item #3 states that: "[i]n accordance with Env-A 1403.01, new or modified devices or processes installed after May 8, 1998, shall be subject to the requirements of Env-A 1400." Unless Troy Mills installed a new device or modified a device or process after May 8, 1998, Troy Mills must certify "N/A" with this requirement. If Troy Mills installed a new device, or modified a device or process since May 8, 1998, then it is subject to this requirement. Since DES has information that indicates that Troy Mills did not comply with the ambient air limits of Env-A 1400 during calendar year 2001, Troy Mills must certify "Not in Compliance" with item #3;

5. Troy Mills certified that it was in "Continuous" compliance with item #4 of Table 3, Condition VIII.A of the Permit during calendar year 2001. Item #4 states that: "[i]n accordance with 1403.02(a), all existing unmodified devices or processes which are in operation during the transition period ending three years from May 8, 1998 (May 8, 2001), shall comply with either Env-A 1300 or Env-A 1400." Since DES has information that indicates that Troy Mills was not in compliance with the ambient air limits of Env-A 1300 or Env-A 1400 during the transition period ending May 8, 2001, Troy Mills must certify "Not in Compliance" with item #4;
6. Troy Mills certified that it was in "Continuous" compliance with item #5 of Table 3, Condition VIII.A of the Permit during calendar year 2001. Item #5 states that: "[i]n accordance with Env-A 1403.02(b), all existing devices or processes in operation after the transition period ending three years from May 8, 1998 (May 8, 2001), shall comply with Env-A 1400. Env-A 1300 will no longer be in effect." Since DES has information that indicates that Troy Mills has not complied with the ambient air limits of Env-A 1400 since the end of the transition period on May 8, 2001, Troy Mills must certify "Not in Compliance" with item #5;
7. Troy Mills certified that it was in "Continuous" compliance with item #6 of Table 3, Condition VIII.A of the Permit during calendar year 2001. Item #6 states that: "[t]he owner of an existing device or process requiring a permit under chapter Env-A 1400, shall submit to the DES no later than one year prior to the end of the transition period (May 8, 2000), an application for a modification to a Title V permit in accordance with Env-A 609.18, and a request to the DES to perform air-dispersion modeling." Troy Mills has not submitted an application for a modification to the Permit stating how it will comply with the ambient air limits of Env-A 1400. Therefore, Troy Mills must certify "Not in Compliance" with item #6;
8. Troy Mills certified that it was in "Continuous" compliance with item #7 of Table 3, Condition VIII.A of the Permit during calendar year 2001. Item #7 states that: "[i]n accordance with Env-A 1405.03, the owner of an existing device or process requiring a permit under Env-A 1300 shall submit to the DES no later than one year prior to the end of the transition period (May 8, 2000), a compliance plan identifying how the device or process will comply with chapter Env-A 1400 by the end of the transition period." Troy Mills must certify "N/A" with this requirement since item #7 required compliance for the period ending May 8, 2000. However, Troy Mills was never in continuous compliance with item #7, since it has never submitted a compliance plan identifying how it will comply with the ambient air limits of Env-A 1400;
9. Troy Mills certified that it was in "Continuous" compliance with item #8 of Table 3, Condition VII.A of the Permit during calendar year 2001. Item #8 states that: "[i]n accordance with Env-A 1406.01 the owner of any device or process, which emits a regulated toxic air pollutant, shall determine compliance with the ambient air limits by using one of the methods provided in Env-A 1406.02, Env-A 1406.03, or Env-A 1406.04. Upon request, the owner of any device or process, which emits a regulated toxic air pollutant, shall provide documentation of compliance with the ambient air limits to the DES. In accordance with Env-A 1404.01(d), documentation for the demonstration of compliance shall be retained at the site, and shall be made available to the DES for inspection." Troy Mills did not have documentation of compliance with Env-A 1400 during calendar 2001 and therefore must certify "Not in Compliance" with item #8. As of the date of this LOD, the data that has been submitted to DES by Troy Mills does not demonstrate compliance with the ambient air limits of Env-A 1400. If Troy Mills does have documentation of a completed compliance demonstration with Env-A 1400, please submit this documentation to DES;

10. Troy Mills certified that it was in "Intermittent" compliance with items #1 and #2 of Table 4, Condition VIII.B of the Permit during calendar year 2001. Item #1 applies to EU01 and states that: "[n]o owner or operator shall cause or allow average opacity from a fuel burning device installed after May 13, 1970 in excess of 20 percent for any continuous 6-minute period in a 60-minute period." Item #2 applies to EU02 and states that: "[n]o owner or operator shall cause or allow average opacity from a fuel burning device installed on or prior to May 13, 1970 in excess of 40 percent for any continuous 6-minute period in a 60-minute period." Troy Mills stated in the column labeled "Summary of deviations from requirements" that the monitoring was not performed at the prescribed frequency. The monitoring requirement of item #2 of Table 5, Condition VIII.D of the Permit, requires opacity monitoring to be performed on an "as-needed" basis. There is no prescribed frequency for the monitoring of opacity in the Permit. Since Troy Mills did not submit any permit deviation reports to DES for calendar year 2001, it is not clear exactly what Troy Mills is referring to when certifying "Intermittent" compliance. For instance, were there periods when the opacity exceeded the applicable opacity limit, but Troy Mills failed to properly document the exceedance(s) as required by the Permit? Please explain any incidents of non-compliance with items #1 or #2 in the re-submittal of this annual compliance certification. If there were no incidents of non-compliance with items #1 or #2 of Table 4, Troy Mills can certify "Continuous" compliance with these requirements;

11. Troy Mills certified that it was "Not in Compliance" with item #3 of Table 4, Condition VIII.B of the Permit during calendar year 2001. Item #3 is a facility-wide standard and states that: "[n]o owner or operator shall cause or allow visible fugitive emissions or visible stack emissions for any process, manufacturing or service based industry to exceed an average of 20 percent opacity for any continuous 6-minute period in a 60-minute period." Troy Mills states in the column labeled "Summary of deviations from requirements" that there was "excessive opacity." If there were any continuous 6 minute periods when Troy Mills' opacity exceeded an average of 20 percent during calendar year 2001, then Troy Mills must certify "Intermittent" compliance with item #3, and summarize each of these exceedances as a permit deviation. Only if Troy Mills continuously exceeded the 20 percent opacity standard during the entire year, would it have to certify "Not In Compliance". Since it is not clear exactly what Troy Mills is referring to when certifying "Not in Compliance", please explain any incidents of non-compliance with item #3 in the re-submittal of this annual compliance certification;

12. Troy Mills certified that it was "Not in Compliance" with items #2 and #3 of Table 5, Condition VIII.D of the Permit during calendar year 2001. Items #2 and #3 require that opacity monitoring be performed on an "as-needed" basis. Troy Mills stated in the column labeled "Summary of deviations from requirements" that monitoring was not performed. Since Troy Mills did not submit any permit deviation reports to DES for calendar year 2001, it is not clear exactly what Troy Mills is referring to when certifying "Not in Compliance." For instance, were there periods where the opacity exceeded the applicable opacity limit and Troy Mills should have, but failed to, properly document the exceedance(s) as required by the Permit? Please explain any incidents of non-compliance with items #2 or #3 in the re-submittal of the annual compliance certification. If there were not any incidents of non-compliance with items #2 or #3 of Table 5, Troy Mills can certify "Continuous" compliance with these requirements. If there were only periodic incidents of non-compliance with items #2 or #3 of Table 5, Troy Mills can certify "Intermittent" compliance with these requirements;

13. Troy Mills certified that it was "Not in Compliance" with item #9 of Table 5, Condition VIII.D of the Permit during calendar year 2001. Item #9 states that: "[c]alibration of the fuel metering devices shall be conducted at a frequency in accordance with manufacturer's specifications and following manufacturer's recommended procedures or shall occur at least once annually." Please include in the re-submittal of the annual compliance certification, documentation of the last calibration of the fuel metering devices;

14. Troy Mills certified that it was "Not in Compliance" with item #11 of Table 5, Condition VIII.D of the Permit during calendar year 2001. Item #11 requires Troy Mills to "perform regular maintenance of the EU06 spray booth filter pads and clean or replace spray nozzles, and maintain a log indicating dates of spray nozzle replacement." Troy Mills stated in the column labeled "Summary of deviations from requirements" that "the log book was not filled in." This requirement was deleted from the Permit by the amendment of July 16, 2002. Please include in the re-submittal of this annual compliance certification, any documentation of compliance with this requirement that Troy Mills may have for the period of calendar year 2002 until this requirement was removed by the amendment to the Permit;

15. Troy Mills certified that it was "Not in Compliance" with item #7 of Table 6, Condition VIII.E of the Permit during calendar year 2001. Item #7 requires Troy Mills to keep daily records for each process, including hours of operation, total quantity of raw materials used, records of process weights, the number of hours of operation corresponding to the process weight quantities, and the distribution of the process discharges if the process discharges air pollutants through more than one discharge point. Troy Mills stated in the column labeled "Summary of deviations from requirements" that "daily records not done for all operations." If Troy Mills kept some of the daily records required by item #7, then Troy Mills can certify "Intermittent" compliance with this requirement. Please include in the re-submittal of this annual compliance certification, documentation of any of the daily records required by item #7 of Table 6 that were maintained by Troy Mills;

16. Troy Mills certified that it was "Not in Compliance" with item #9 of Table 6, Condition VIII.E of the Permit during calendar year 2001. Item #9 requires Troy Mills to record in a permanently bound logbook whenever the filter pad in the spray booth (EU06) is changed. Troy Mills states in the column labeled "Summary of deviations from requirements" that the logbook was not kept. This requirement was deleted from the Permit by the amendment of July 16, 2002. Please include in the re-submittal of the annual compliance certification, any documentation of compliance with this requirement that Troy Mills may have for the period of calendar year 2002 until this requirement was removed by the amendment to the Permit;

17. Troy Mills certified that it was "Not in Compliance" with item #10 of Table 6, Condition VIII.E of the Permit during calendar year 2001. Item #10 requires Troy Mills to maintain records, on a monthly and a rolling, consecutive, 12-month basis, on each VOC-emitting device or process, including the operating schedule, annual theoretical potential emissions and actual VOC emissions in tons per year and typical high ozone season day. Troy Mills stated in the column labeled "Summary of deviations from requirements" that daily data were not maintained. However, daily VOC data is not required to be maintained, other than to calculate the monthly and 12-month rolling totals. If all data was calculated as required, Troy Mills can certify "Continuous" compliance with item #10 of Table 6;

18. Troy Mills certified that it was "Not in Compliance" with item #11 of Table 6, Condition VIII.E of the Permit during calendar year 2001. Item #11 requires Troy Mills to maintain records, on a monthly and a rolling, consecutive, 12-month basis, of all surface coating and drying operations, including the coating and dye formulation and analytical information, consumption data and process information, and annual, normal operating day and high ozone day throughput. Troy Mills stated in the column labeled "Summary of deviations from requirements" that "all data not compiled for ozone seasons." If all other data required by item #11 was maintained, and only the ozone season data is missing, Troy Mills can certify "Intermittent" compliance with item #11 of Table 6;

19. Troy Mills certified that it was "Not in Compliance" with item #12 of Table 6, Condition VIII.E of the Permit during calendar year 2001. Item #12 requires Troy Mills to maintain records for its fuel burning devices, including boilers, and internal combustion engines. Troy Mills stated in the column labeled "Summary of deviations from requirements" that "theoretical information incomplete". If the only data that Troy Mills does not have is the "theoretical potential emissions for each fuel burning device" required by section (e)(1) of item #12, Troy Mills can certify "Intermittent" compliance with item #12 of Table 6;

20. Troy Mills certified that it was "Not in Compliance" with item #1 of Table 7, Condition VIII.F of the Permit for calendar year 2001. Item #1 requires Troy Mills to submit semi-annual PD/M reports to DES for the periods of July–December and January–June by the following January 31 and July 31, respectively. The Permit was issued to Troy Mills on December 14, 2000. DES exempted Troy Mills from having to submit a PD/M report for the period of December 14-31 of 2000. Troy Mills submitted the semi-annual report for January-June of 2001 on July 13, 2001, prior to the deadline. Therefore, Troy Mills can certify "Continuous" compliance with item #1 of Table 7.

Troy Mills did not submit the semi-annual PD/M reports for July-December of 2001 and January-June of 2002 that were required to be submitted to DES by January 31 and July 31, 2002, respectively. Troy Mills must certify "Not in Compliance" with item #1 of Table 7 in the annual compliance certification for calendar year 2002, which is due to be submitted to DES no later than April 15, 2003;

21. Troy Mills certified that it was in "Continuous" compliance with item #2 of Table 7, Condition VIII.F of the Permit for calendar year 2001. Item #2 requires Troy Mills to submit to DES by April 15, 2001, an annual fuel usage report indicating consecutive 24-hour and consecutive 12-month rolling totals of fuel oil utilization. The report that Troy Mills submitted on February 28, 2001 did not include consecutive 24-hour and consecutive 12-month rolling totals of fuel oil utilization. Since the report did contain annual fuel oil usage, Troy Mills must certify "Intermittent" compliance with item #2 of Table 7;

22. Troy Mills certified that it was in "Continuous" compliance with item #3 of Table 7, Condition VIII.F of the Permit for calendar year 2001. Item #3 requires Troy Mills to submit to DES by April 15, 2001 an annual fuel usage report indicating consecutive 24-hour and consecutive 12-month rolling totals of LPG utilization. The report that Troy Mills submitted on February 28, 2001 did not include consecutive 24-hour and consecutive 12-month rolling totals of LPG usage. Since the report did contain annual LPG usage, Troy Mills must certify "Intermittent" compliance with item #3 of Table 7;

23. Troy Mills certified that it was "Not in Compliance" with item #4 of Table 7, Condition VIII.F of the Permit for calendar year 2001. Item #4 requires Troy Mills to submit to DES by April 15, 2001 a report of the VOC data which is required to be maintained in accordance with the recordkeeping requirements of items #10 & #11 of Table 6, Condition VIII.E. Since the report that Troy Mills submitted on February 28, 2001 contained only some of the information required to be maintained by items #10 and #11 of Table 6, Troy Mills must certify "Intermittent" compliance with item #4 of Table 7;

24. Troy Mills certified that it was "Not in Compliance" with item #5 of Table 7, Condition VIII.F of the Permit for calendar year 2001. Item #5 requires Troy Mills to submit to DES by April 15, 2001 a report of the NOx data which is required to be maintained in accordance with the recordkeeping requirement of item #12 of Table 6, Condition VIII.E. Since the report that Troy Mills submitted on February 28, 2001 contained only some of the information required to be maintained by item #12 of Table 6, Troy Mills must certify "Intermittent" compliance with item #5 of Table 7; and

25. Troy Mills certified that it was in "Continuous" compliance with item #8 of Table 7, Condition VII.F of the Permit for calendar year 2001. Item #8 states that "annual reporting and payment of emission based fees for pollutants, including but not limited to SO<sub>2</sub>, NO<sub>x</sub>, CO, TSP, and VOCs, shall be conducted in accordance with Section XXIII of this Permit." Troy Mills did not submit the annual emissions-based fee for calendar year 2000 to DES. Therefore, Troy Mills must certify "Not in Compliance" with item #8 of Table 7.

DES believes that the above-noted deficiencies can be resolved by Troy Mills taking the following actions

26. Within 45 days of issuance of this LOD, please re-submit the annual compliance certification for calendar year 2001, correcting the deficiencies noted above;

27. Within 45 days of issuance of this LOD, please submit the semi-annual PD/M reports for the reporting periods of July-December, 2001 and January-June, 2002. (Reference item #1 of Table 7, Condition VII.F of the Permit, and Paragraph #20 of this LOD);

28. Within 45 days of issuance of this LOD, submit permit deviation reports for all permit deviations identified in the annual compliance certification for calendar year 2001 that were not reported individually to DES within 24 hours of each occurrence. (Reference item #6 of Table 7, Condition VII.F and Condition XXVIII of the Permit). In addition, also submit permit deviation reports for all permit deviations that have occurred since January 1, 2002 to the present, that have not been reported individually within 24 hours of each occurrence. Reporting of individual permit deviations can be accomplished by completing "Part 5-Permit Deviation Report" of the Semi-Annual PD/M Report section of the Guidance document, or the Permit Deviation report form;

29. Within 30 days of issuance of this LOD, please submit to DES documentation of the demonstration of compliance with the ambient air limits, using one of the methods specified in Env-A 1406.01 that is required to be completed and maintained on site. (Reference item #8 of Table 3, Condition VIII.A of the Permit, and Paragraphs #3 through #9 of this LOD). If the compliance evaluation shows a predicted exceedance of any of the ambient air limits specified in Env-A 1450.01, then submit a compliance plan to DES in accordance with Env-A 1405.03 within 45 days of issuance of this LOD;

30. Within 45 days of issuance of this LOD, please submit documentation of having performed the calibration of the fuel metering devices that is required to be performed at least once annually. (Reference item #9 of Table 5, Condition VIII.D of the Permit, and Paragraph #13 of this LOD). If upon receipt of this LOD, Troy Mills determines that it has not complied with this annual requirement since prior to calendar year 2001, then perform the calibration of the fuel metering devices and submit a report of the calibration to DES within 45 days issuance of this LOD;
31. Within 45 days of issuance of this LOD, please submit documentation of proper use of a logbook to record the replacement of the EU06 spray booth filter pads, and the cleaning or replacement of spray nozzles, during calendar year 2002 prior to the amendment of the Permit. (Reference item #11 of Table 5, Condition VIII.D and item #9 of Table 6, Condition VIII.E of the Permit, and Paragraphs #14 and #16 of this LOD);
32. Within 45 days of issuance of this LOD, please submit documentation that the process and combustion equipment records are being maintained. (Reference items #11 and #12 of Table 6, Condition VIII.E of the Permit, and Paragraphs #18 and #19 of this LOD);
33. Within 45 days of issuance of this LOD, please submit documentation, including an example of several days of data that demonstrates that the daily records for process data and raw material usage are being maintained. (Reference item #7 of Table 6, Condition VIII.E, of the Permit, and Paragraph #15 of this LOD);
34. Within 45 days of issuance of this LOD, please submit the consecutive 24-hour and consecutive 12-month rolling totals of fuel oil and LPG utilization for calendar year 2001. (Reference items #2 and #3 of Table 7, Condition VIII.F of the Permit, and Paragraphs #21 and #22 of this LOD);
35. Within 45 days of issuance of this LOD, please submit the VOC and NO<sub>x</sub> data that was missing from the report for calendar year 2000 that was submitted to DES on February 28, 2001. (Reference items #4 and #5 of Table 7, Condition VIII.F of the Permit, and Paragraphs 23 and #24 of this LOD); and
36. Within 30 days of issuance of this LOD, please submit information clarifying the current operating and ownership status of the permitted devices. Also, please provide any information pertaining to future operation of the permitted devices.

Although Troy Mills is not required to use the forms included in the guidance package for submission of the annual compliance certification and semi-annual PD/M reports to DES, all the information contained in the forms must be submitted to DES in order to comply with the reporting requirements of the Permit. Prior to issuing the guidance package, DES accepted reports that contained less than all the information required to be included in the reports as stated in the Permit. DES will no longer accept partial reporting of information. DES may choose to initiate formal enforcement action for failure to comply with Title V reporting requirements, including issuing an order requiring the deficiencies to be corrected, and/or penalties for repeated reporting violations. DES has sought penalties for late annual compliance certifications, and may also seek penalties for late semi-annual PD/M reports. In addition, the US EPA also reviews the annual compliance certification. The US EPA may identify sources that submit incomplete or late annual compliance certifications as High Priority Violators, making those sources subject to increased likelihood of inspection and enforcement.



In addition to the above requested actions, DES wants to remind Troy Mills that it is required to comply with all of the terms and conditions of the Permit and of the NH Administrative Rules. In the event compliance is not achieved within the time periods indicated, DES may initiate formal action against Troy Mills including issuing an order requiring the deficiencies to be corrected, and/or referring this matter to the NH Department of Justice for imposition of civil and/or criminal penalties. DES reserves the right to pursue administrative fines for the violations noted above.

Please address all information to Raymond Walters, at the following address:

NHDES Air Resources Division  
Compliance Bureau  
6 Hazen Drive  
P.O. Box 95  
Concord, NH 03302-0095

Please be advised that DES will continue to monitor Troy Mills' compliance status and that this letter does not provide relief against any other existing or future violations. It is important that Troy Mills be aware of all the requirements stipulated in its Permit. Please feel free to contact DES should you have any questions regarding compliance with the NH Code of Administrative Rules Env-A 100 *et seq.* and the requirements of the Permit. A current copy of the Air Resources Division rules can be obtained from the DES website at [www.ces.state.nh.us/ard/ardrules.htm](http://www.ces.state.nh.us/ard/ardrules.htm), or by contacting the Public Information Center at (603) 271-2975.

Should you have any questions regarding this matter, please contact Ray Walters at (603) 271-6288 or Mary Ruel at (603) 271-6795 at the Air Resources Division, Compliance Bureau.

Sincerely,



Pamela G. Monroe  
Administrator, Compliance Bureau  
Air Resources Division

PGM/raw

cc: James Barker, Knowlton Nonwovens, Inc.  
R. Scott, Acting Director, NHDES-ARD  
G. Rule, NHDES-O/C  
R. Kurowski, EPA Region I  
L. McCulley, Chairman of Selectmen, Town of Troy  
G. Shattler  
File AFS# 330C500016